

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TAYSEER YOUSEF,

INDICTMENT

Defendant.

/

The Grand Jury charges:

COUNT 1

(Conspiracy to Transport Stolen Goods Interstate)

Beginning some time prior to March 2020, and continuing through at least January 2021, the exact dates being unknown to the grand jury, in the Southern Division of the Western District of Michigan and elsewhere,

TAYSEER YOUSEF

and others known and unknown to the grand jury, knowingly conspired and agreed to transport, transmit, and transfer in interstate and foreign commerce goods, wares, and merchandise, of the value of \$5,000 or more, knowing the same to have been stolen, converted, and taken by fraud, in violation of Title 18, United States Code, Section 2314.

OBJECT & PURPOSE

The object of the conspiracy was to steal electronic devices. The purpose of the conspiracy was to sell those stolen devices to make money.

MANNER & MEANS

1. Members of the conspiracy located in the Grand Rapids, Michigan area robbed local Target, AT&T, Verizon, and T-Mobile stores in hostile, takeover-style robberies.

2. The robbers often entered stores wearing masks, threatened store employees and customers, displayed firearms, forced employees and customers to the ground or other locations, and stole various electronic devices.

3. After stealing electronic devices, members of the conspiracy contacted YOUSEF to arrange to meet him and sell the stolen devices. YOUSEF provided the robbers his current going rate, based on the model and condition of the stolen device.

4. YOUSEF then arranged to meet to purchase the stolen devices. At times, he purchased them directly from the robbers. Other times, he purchased them from intermediaries.

5. In buying the stolen devices, YOUSEF drove to various locations in the Western District of Michigan. Other times, the robbers or intermediaries drove to the Chicago, Illinois area, where YOUSEF lived.

6. After purchasing the stolen devices, YOUSEF re-sold them. YOUSEF sold some of the phones at his cell phone store, located in Tinley Park, Illinois. He sold others overseas.

OVERT ACTS

1. On or about November 15, 2020, five suspects robbed the AT&T store located at 3720 Alpine Ave. NW in Comstock Park, Michigan. The robbers forced store employees to a safe, and they stole electronic devices worth approximately \$47,143.29. Shortly after the robbery, YOUSEF had this conversation with someone known to the grand jury, who was using a phone with the number ending 5586:

5586: 11 12s 64
Yousef: That's it ?
5586: 12 mini 64 gig
5586: 1 11 128gb
5586: 1 11 pro max 64 fb
5586: Gb
5586: 1 11 64 gig
5586: 1 11 pro max 256 gb
Yousef: [list of prices for various electronic devices]
5586: Bet
5586: San location
Yousef: Yes
5586: Den location
5586: Send
5586: ?
Yousef: 1400 Mall Dr Benton Harbor, MI 49022 United States
Yousef: Walmart
5586: How much for while load
Yousef: \$7,820

2. YOUSEF traveled to Michigan that day to obtain the stolen devices. He then returned to Illinois.

3. On or about January 20, 2021, three people robbed the T-Mobile store located at 350 84th Street SW in Grand Rapids, Michigan. The robbers shoved a store employee to a back room and forced the employee to open a safe. The robbers stole electronic devices worth approximately \$39,720. Shortly after the robbery, YOUSEF had this conversation with someone known to the grand jury, who was using a phone with the number ending 6326:

6326: It's 40 regular 12's
6326: 16 maxes
6326: 4 androids
6326: And 5 7 minus
6326: 7* mini's
Yousef: 40 12?
Yousef: I thought u said 22
6326: Yes
6326: We have more
6326: Facet time me
6326: I can show you
6326: Send me price list
Yousef: Ok
Yousef: [list of prices for various electronic devices]
Yousef: 10 minutes
Yousef: How far are you
....
6326: I'm still 49 minutes wanna meet a lil closer ?
Yousef: Ok lett me see
6326: Liked "Ok lett me see"
6326: Okay
Yousef: 6100 Sawyer Rd Sawyer, MI 49125 United States
6326: 36 minutes
Yousef:

4. YOUSEF traveled to Michigan that day to obtain the stolen devices. He then returned to Illinois.

5. On or about February 1, 2021, YOUSEF had this conversation with someone known to the grand jury using a phone number ending 6326. In that conversation, YOUSEF advised other members of the conspiracy on how to avoid law enforcement:

6326: Can you meet now
....
6326: Wait
6326: They on us right now
Yousef: Dam
Yousef: They chasing u
6326: Mann
6326: Hell yeah
6326: High speed
Yousef: Ok lmk
6326: Okay
Yousef: Lose them on side streets
6326: They like 4 cars deed
6326: We gone come early
6326: It's hot right now
Yousef: Man bro why u don't come out here
Yousef: It's safer
6326: Highway hot
Yousef: Get out of the state
6326: We can't leave to many police
Yousef: Ok tomorrow come early
....
Yousef: Check the phones with the older phone it might have a tracker in it
6326: They good

18 U.S.C. § 371

18 U.S.C. § 2314

COUNT 2
(Interstate Transportation of Stolen Goods)

On or about November 15, 2020, in the Southern Division of the Western District of Michigan and elsewhere,

TAYSEER YOUSEF

knowingly transported, transmitted, and transferred in interstate and foreign commerce goods, wares, and merchandise, of the value of \$5,000 or more, knowing the same to have been stolen, converted, and taken by fraud.

18 U.S.C. § 2314

COUNT 3
(Interstate Transportation of Stolen Goods)

On or about January 20, 2021, in the Southern Division of the Western District of Michigan and elsewhere,

TAYSEER YOUSEF

knowingly transported, transmitted, and transferred in interstate and foreign commerce goods, wares, and merchandise, of the value of \$5,000 or more, knowing the same to have been stolen, converted, and taken by fraud.

18 U.S.C. § 2314

FORFEITURE ALLEGATION
(Transportation of Stolen Property)

The allegations contained in Counts 1-3 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of a violation of 18 U.S.C. § 2314 set forth in Counts 1-3 of this Indictment,

TAYSEER YOUSEF

shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to such violation. The property to be forfeited includes, but is not limited to, the following:

1. MONEY JUDGMENT: A sum of money that represents the proceeds obtained from the offenses charged in Counts 1-3.
2. PERSONAL PROPERTY: Stolen electronic devices used in the commission of the offenses charged in Counts 1-3.
3. SUBSTITUTE ASSETS: If any of the property described above, as a result of any act or omission of the defendant:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p) as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 981(a)(1)(C)

28 U.S.C. § 2461(c)

21 U.S.C. § 853(p)

18 U.S.C. § 2314

A TRUE BILL



GRAND JURY FOREPERSON

MARK A. TOTTEN
United States Attorney



DAVIN M. REUST
Assistant United States Attorney